

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SHAAIRILLE LINZY, )  
*Plaintiff*, )  
v. )  
UBER TECHNOLOGIES, INC., )  
*Defendant*. ) 1:21-cv-05097-ER

**PROPOSED VOIR DIRE**

1. In this case Ms. Linzy indicates she suffered an injury when struck by a car. You may feel sympathy for her. However, the judge will instruct you that, while in this courtroom, you must set aside those sympathies and reach a verdict based on the law and the evidence. Do any of you think you will not be able to do that?

2. Does anyone think that they will not be able to apply the law that the Court gives you even if it means that the plaintiffs will not receive any money in this case?

3. Do any of the jurors believe that a person should recover money in a lawsuit simply because he or she has been injured or has suffered some harm or loss? What about relative to a company...does anyone believe that even if a corporation is not at fault, they should have to pay because they are a corporation?

4. Do you have a smartphone or tablet?

5. Do you have apps or applications on your smartphone or tablet that you use regularly?

6. Do you feel comfortable using technology such as apps or applications on your smartphone and/or tablet?

7. Do you regularly purchase items online using a website or application on our smartphone or tablet?

8. Have you or any close family member or friend ever used the Uber App in order to connect with a driver for transportation services?
9. Have you or any close family member or friend ever used the driver version of the Uber App in order to provide transportation services to riders?
10. Do any of you have a negative opinion of ridesharing apps such as Uber?
11. Have you, your friends, any member of your family, or any acquaintance ever had a bad experience with Uber – either as a passenger or as a driver?
12. Do you have any opinions about Uber that you believe would prevent you from being fair and impartial in this case?
13. Are you familiar with any regulations or laws that apply to Uber?
14. Have you read or heard anything about Uber in the news that you believe would cause you to have difficulty rendering a fair and impartial verdict in this case?
15. Have you ever worked as an independent contractor?
16. Have you ever hired an independent contractor or an employee? In what context?
17. Have you or any of your family members or close friends ever been involved in a motor vehicle accident?
  - a. If so, was the accident minor or severe?
  - b. Was anyone injured in that accident? What were the nature of the injuries/how severe? Did anyone die in the accident?
  - c. Who do you/your family member or friend believe was at fault for that accident – you/them, or the other driver?
18. Have you or any of your family members ever been involved in a lawsuit involving personal injuries?

- a. If so, were you a plaintiff or a defendant?
- b. What were the nature of the injuries claimed?
- c. Did you feel like you were treated fairly by or in the judicial process? If not, why not?

19. Is there any reason why you believe that you could not be fair and impartial to both sides in this case?

20. Will you agree to wait to hear all of the evidence in the trial and the judge's instructions on the law before making your decision in this case?

21. Do any of the jurors have any problem with the instruction that they must treat any company the same as an individual and that companies and individuals must be treated fairly and equally under the law?

22. Do any of you have any inherent dislike or distrust of Uber or companies in general?

23. Do you believe that businesses like Uber have the same right to a fair trial that an individual has?

24. Have you read or heard anything about Uber in the news that you believe would cause you to have difficulty rendering a fair and impartial verdict in this case?

25. Do any of the jurors hold any opinions about awards in personal injury cases being too high or too low?

Respectfully submitted,  
DEFENDANT,  
UBER TECHNOLOGIES, INC.  
By their attorneys,

/s/ Andrew R. Ferguson  
Andrew R. Ferguson (AF5154)  
Coughlin Betke LLP  
1330 Avenue of the Americas  
Suite 23A  
New York, NY 10019  
212-653-0380  
[aferguson@coughlinbetke.com](mailto:aferguson@coughlinbetke.com)

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to all counsel of record on December 16, 2024.

/s/ Andrew R. Ferguson  
Andrew R. Ferguson